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[Proposed] Counsel to the Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION**

In re:

INTERNATIONAL LONGSHORE
AND WAREHOUSE UNION,

Debtor.

Case No. 23-30662 (HLB)

Chapter 11

**NOTICE OF HEARING ON DEBTOR'S
MOTION FOR ENTRY OF ORDER (I)
AUTHORIZING EMPLOYMENT AND
PAYMENT OF PROFESSIONALS
UTILIZED IN THE ORDINARY COURSE
OF BUSINESS AND (II) GRANTING
RELATED RELIEF**

Hearing Date:

Date: November 9, 2023
Time: 10:00 a.m. (Pacific Time)
Place: Zoom / Telephonic
Judge: Hon. Hannah L. Blumenstiel

PLEASE TAKE NOTICE that, on October 7, 2023, the International Longshore and Warehouse Union ("ILWU" or "Debtor"), the above-captioned debtor and debtor in possession, filed its *Motion for Entry of Order (I) Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* [Docket No. 47] (the "OCP Motion").

PLEASE TAKE NOTICE that, on November 9, 2023, at 10:00 a.m., or as soon thereafter as the matter may be heard, the Honorable Hannah L. Blumenstiel, United States Bankruptcy Judge, will conduct a hearing on the OCP Motion. The OCP Motion seeks the entry of an order (a)

1 authorizing, but not directing, the Debtor to employ and pay its ordinary course professionals
2 without the necessity of a separate, formal retention application approved by this Court for each
3 ordinary course professional; and (b) authorizing, but not directing, the Debtor to pay the ordinary
4 course professionals for post-petition services rendered and expenses incurred without the necessity
5 of additional court approval.

6 **PLEASE TAKE FURTHER NOTICE** that each interested party opposing or responding to
7 the OCP Motion must file and serve their response no later than **November 2, 2023**. Failure to
8 timely object may be deemed by the Court to constitute consent to the relief requested in the OCP
9 Motion.

10 **PLEASE TAKE FURTHER NOTICE** that copies of the OCP Motion can be obtained by
11 contacting the undersigned counsel.

12 **PLEASE TAKE FURTHER NOTICE** that the hearing will not be conducted in the
13 presiding judge's courtroom but instead will be conducted by telephone or video. All interested
14 parties should consult the Bankruptcy Court's website (<https://www.canb.uscourts.gov/>) for
15 information explaining how to arrange an appearance at a video/telephonic hearing. If you have
16 questions about how to appear at the court hearing and participate in the video hearing, you may
17 contact the court by calling 888-821-7606 or by using the Live Chat feature on the Court's website.

18 Dated: October 7, 2023

PACHULSKI STANG ZIEHL & JONES LLP

20 /s/ Jason Rosell

21 Debra I. Grassgreen
22 Jason H. Rosell

23 *[Proposed] Counsel to the Debtor*
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